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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
FOR THE WESTERN DIVISION

VIVIAN BERT, et al., : CASE NO. 1:02cv00467
Plaintiffs, : Judge Beckwith
v. :
AK STEEL CORPORATION, :
Defendant. :

Deposition of THADDEUS R. FREEMAN, taken on
Tuesday, June 5, 2007, commencing at 9:10 a.m., at
the offices of Taft, Stettinius & Hollister LLP,
425 Walnut Street, Suite 1800, Cincinnati, Ohio,
before Susan M. Barhorst, Notary Public.

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1 A. Boy, I tell you. Did I review them?
2 Well, yeah, pretty much. I mean, you know, I -- I
3 can't remember exactly -- you know, it's -- when
4 you going through a bankruptcy -- you know, they
5 say sign here, you -- it's --

6 Q. Were you represented by counsel for
7 the bankruptcy, an attorney?

8 A. There was a young lady from Mr. West's
9 office that I don't know if she's a paralegal or --
10 I know she worked in his office. She was at the
11 bankruptcy court with me --

12 Q. Okay.

13 A. -- the day of --

14 Q. Mr. West was the attorney you hired?

15 A. Yes.

16 Q. Okay. You understood that the
17 bankruptcy was a legal proceeding?

18 A. Yes.

19 Q. And you understood -- so that signing
20 these papers you were declaring under penalty of
21 perjury that they were true and correct?

22 A. Yes.

23 Q. And you did not disclose this
24 litigation to -- on your bankruptcy petition, did

1 you?

2 A. When I went to the bankruptcy court, I
3 met Mr. West's -- I didn't meet him, but the young
4 lady at the bankruptcy hearing. And she asked me
5 at the bankruptcy hearing if I was in a lawsuit and
6 I told her that I was in a lawsuit with AK Steel.

7 And she told me that -- were we close
8 to settlement. And I said I don't think so. She
9 said, well, don't worry about it. And that's the
10 only time that I remember anything being brought up
11 about lawsuit.

12 Q. And she was with Mr. West's office?

13 A. Yes.

14 Q. You don't know what her name was?

15 A. No, I didn't -- I don't really -- I
16 can't remember her name.

17 Q. Okay. So you guys, then, did not
18 disclose that to the bankruptcy court or the
19 bankruptcy trustee?

20 A. She just --

21 MS. DONAHUE: Object to the form.

22 A. She just --

23 Q. No?

24 A. She just told me not to worry about